UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

ESTATE OF ERIC RIVERA, by and through successors in interest, PHILLIP MALIK and VALERIE RIVERA; PHILLIP MALIK, individually; VALERIE RIVERA, individually,	)	
Plaintiffs,	)	
vs.	)	Case No. 2:17-CV 06939-CBM
CITY OF LOS ANGELES; LOS ANGELES POLICE DEPARTMENT; ARTURO URRUTIA; DANIEL RAMIREZ, and DOES 1 to 10,	)	
Defendants.	)	

CONFIDENTIAL PORTIONS OF THE

DEPOSITION OF

SERGEANT BRADLEY HEARN

Long Beach, California

Friday, December 14, 2018

Reported By: Shirley Koch, RPR
CSR No. 10849
LitiCourt Job No.: 201450

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Defendants.	)	

CONFIDENTIAL PORTIONS OF THE DEPOSITION OF SERGEANT BRADLEY HEARN, commencing from 1:13 p.m. to 4:03 p.m., on Friday, December 14, 2018, taken on behalf of Plaintiffs and reported stenographically, at Casillas & Associates, 3777 Long Beach Boulevard, Third Floor, Long Beach, California, before Shirley Koch, Certified Shorthand Reporter for the State of California, CSR No. 10849, RPR.

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ANDRES MARTINEZ

DANIEL RAMIREZ

ARTURO URRUTIA

JAMES TALMADGE

MARC STERNIN

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The information contained on pages 1 to 117 and 134 to 139 has not been designated as confidential and those pages are bound separately.

Exhibit 10 was marked in the non-designated portion of the transcript but has been designated as confidential and is bound with the confidential portion of the transcript.

CONFIDENTIAL PROCEEDINGS

* * * *

BY MR. CASILLAS:

Q. I have what I believe to be a copy of your transcript, the transcript of your statement. I want you to identify it. Does that appear to be a copy of the statement that you made? You're welcome to read the whole thing, if you want.

MS. LEE: He's looked at it.

BY MR. CASILLAS:

Q. Does that appear to be a transcript of the statement that you gave on June 8th, 2017?

A. Yes.

Q. Okay. As you sit here today, after having read it to prepare for today and after reviewing it now and after having gone through your statement today here in this deposition, is there anything about that statement that in thinking about it now, you believe to be incorrect?

MS. LEE: Okay. And I'm just going to request that we do the same thing that we did on the prior deposition regarding this testimony, that it's going to be under seal pursuant to the protective order.

MR. CASILLAS: The exhibit itself, yes, but not this testimony. I just want to know if there's anything

that is inaccurate about it.

MS. LEE: No. Because you're referring to the testimony. So I'm not going to agree to that. I want his testimony relating to FID, his statements to FID, and if you would intend to attach the transcript, to both be under seal.

MR. CASILLAS: That's fine.

MS. LEE: Okay. You can answer.

BY MR. CASILLAS:

Q. Is there anything about that statement that, as you sit here today, is incorrect?

MS. LEE: Well, objection. Vague and ambiguous and overbroad as to incorrect. I think he can answer if he believes that there's something that he stated in there that maybe he thinks is --

MR. CASILLAS: Not correct?

MS. LEE: -- not to his memory. No, not to his memory.

MR. CASILLAS: Well, I don't want to know about his memory.

BY MR. CASILLAS:

Q. Is there -- when you look at it, is there something that's -- that's incorrect? You said X and you meant Y, or you said X and after thinking about it, it's not X, it's Y? Is there anything like that, that

is just wrong, incorrect?

MS. LEE: Well, same objections. But he can answer if there is something that he saw that he believes that wasn't --

MR. CASILLAS: I'm not going to adopt that, Counsel. I don't care what he meant to say. This is what he said. Okay.

MS. LEE: I understand.

BY MR. CASILLAS:

Q. That accurately -- first of all, does that accurately capture what was said? You said that; right?

A. Yes.

Q. Okay. Is there anything there that you said that is recorded in that document that is not correct?

A. Well, Counsel, you need to be a little bit more specific because in this document, I told FID that at the time I believed he was shot. Then I found out later he wasn't. So that could be an inconsistency. So if you have something specific you want to ask me about my testimony --

Q. And that's a perfect example. You told them you believed he was shot. And as you sit here today, you know now he's not shot; correct?

A. Correct.

Q. Anything else?

A. Could you be more -- that was an example. Could you be more specific about what specific things you --

Q. I don't know. I don't know what is in your head. I mean, after looking at it, it could be, you know, I've looked at all of this and as far as I'm concerned, it's all correct. Or, you know, I told FID about the shooting -- I believe there was a shooting.

Is there anything else there that as you sit here today, after having read that, that is not correct?

MS. LEE: Well, that's extremely overbroad. You're asking him to go -- I mean, this is a, how many page document, 15-page document. If you have any specific questions you want to ask him, then he can answer that. But to sit here and require that he tell you everything that's quote, unquote incorrect, which I still object to, I think that is harassment.

MR. CASILLAS: Harassment?

BY MR. CASILLAS:

Q. I mean, you read it; right? I'm sure you read it carefully in preparing for today's deposition; true?

A. Yes.

Q. Okay. After that careful reading of it, was there anything that, in retrospect, other than what you just told me, is there anything else that struck you as

not being correct?

MS. LEE: Well, once again, Counsel -- and for the record, when you're using the word correct, there is a problem with that. Because at the time -- as the example he gave you, at the time he believed that Officer Urrutia was shot. And there's nothing incorrect about the fact that he believed that. So incorrect seems to say that he believed that and he wrongly believed it. So later on he learned that, in fact, Officer Urrutia was not shot. That's not incorrect. So that's why I have a problem with your wording of incorrect.

So if you're asking him whether or not there was anything that sticks up in his mind that he stated that he now believes isn't true, then that's another question.

MR. CASILLAS: I'll ask it that way then.

THE WITNESS: The testimony that I gave or the information I gave the FID at the time that I -- that this reflects was all true to the facts at that time.

BY MR. CASILLAS:

Q. Is there any fact here that you stated that you have now learned is not accurate?

MS. LEE: Well, that is extremely overbroad. And it's harassment, once again. Because you're asking

him to go through this huge document with multiple --

MR. CASILLAS: Counsel, it's not huge. It's 15 pages.

MS. LEE: Okay. But you're asking him to go through these multiple facts. And when you say he later determined it not to be true, that's not -- that's not an appropriate question.

BY MR. CASILLAS:

Q. It's an absolute appropriate question, just for the example that you just gave us. I mean, if you said, you know what, Chief Beck was out there. Okay. And after you sit there and look and go, you know, I said that Chief Beck was out there. I know he wasn't out there. Okay. And is there anything that just is -- is glaring like that, you know? You gave us the shooting example. Anything you believe -- is there anything about what you stated to them that, in retrospect, you realize is either not accurate or not true or you were mistaken about? I'll even give you that.

MS. LEE: Well, that's compound. Those are different questions. But I think he can answer. And I think he's already answered that he's read the statement. And everything he stated, he believed when he made the statement was true in his mind at the time; is that right?

MR. CASILLAS: And that's coaching. And that's not my question.

MS. LEE: That's not coaching.

BY MR. CASILLAS:

Q. My question is: After reading this, is there anything that you've learned you misstated?

A. I believe the counselor summarized my answer to your question correctly, that at the time that I gave this statement, I believed and still do at that time everything I said was true.

Q. And you offered us the example of learning subsequently that he was not shot. Is there any other information that you received that upon looking at that, is -- you realize now is not accurate?

MS. LEE: Well, same objection. Accurate as to the ultimate fact or accurate as to what he believed at the time?

MR. CASILLAS: No. The ultimate fact. The shooting is a perfect example.

MS. LEE: Well, then that's --

BY MR. CASILLAS:

Q. Is there another example like the shooting that you've subsequently learned were not accurate?

A. Do you have a specific line or a specific fact in here that you're asking me about, sir?

Q. No.
A. Then I wouldn't know which one you're referring to.
Q. I'm not referring to any. I'm asking you if you have any other examples.
MS. LEE: He's already asked -- he's already answered your question. It's asked and answered.
BY MR. CASILLAS:
Q. Any -- any other documents that you reviewed? Oh, better yet, is there anything about that statement that you want to change?
A. No, sir.
(This portion of the confidential proceedings have concluded.)

STATE OF CALIFORNIA)
) ss:
COUNTY OF ORANGE)

I, SHIRLEY KOCH, do hereby certify:

That I am a duly qualified Certified Shorthand Reporter, in and for the State of California, holder of certificate number 10849, which is in full force and effect and that I am authorized to administer oaths and affirmations;

That the foregoing deposition testimony of the herein named witness was taken before me at the time and place herein set forth;

That prior to being examined, the witness named in the foregoing deposition, was duly sworn or affirmed by me, to testify the truth, the whole truth, and nothing but the truth;

That the testimony of the witness and all objections made at the time of the examination were recorded stenographically by me, and were thereafter transcribed under my direction and supervision;

That the foregoing pages contain a full, true and accurate record of the portion of the proceedings and testimony which was designated as "Confidential" to the best of my skill and ability;

That prior to the completion of the foregoing deposition, review of the transcript was requested.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, nor am I a relative or employee of such attorney or counsel, nor am I financially interested in the outcome of this action.

IN WITNESS WHEREOF, I have subscribed my name this ____ day of _____, ____.

_____

SHIRLEY KOCH, CSR No. 10849

PENALTY OF PERJURY CERTIFICATE

I hereby declare I am the witness in the above captioned matter; that I have read the foregoing transcript or that it has been read to me, and I know the contents thereof; that the transcript is true to my knowledge, except as to those matters which are herein stated upon my information or belief, and as to those matters, I believe them to be true; that I find the transcript to be a true and accurate transcription of the portion of my testimony which was designated "Confidential", with the following corrections, if any:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the ____ day of _____ 20___, at _____, _____.
(City) (State)

_____

SERGEANT BRADLEY HEARN

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